

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

JERRY LEON DEES, JR.,

*

Plaintiff,

*

vs.

*

Case No. 2:07-cv-00306-MHT-CSC

HYUNDAI MOTOR MANUFACTURING
ALABAMA, LLC and HYUNDAI MOTOR
AMERICA, INC.,

*

*

Defendants.

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**PLAINTIFF'S TRIAL WITNESSES
PURSUANT TO RULE 26(a)(3) OF THE
FEDERAL RULES OF CIVIL PROCEDURE**

COMES NOW Plaintiff, Jerry Leon Dees, Jr., and pursuant to Rule 26(a)(3), F.R.C.P., hereby discloses the names, addresses and telephone numbers of each witness that the Plaintiff expects to call or that the Plaintiff may call to testify at the trial of the above styled cause:

NAMES OF WITNESSES

I. Plaintiff will call the following witnesses:

- | | | |
|----|-----------------|--|
| 1. | Jerry Leon Dees | 14805 U.S. Hwy 82
Maplesville, AL 36750
(334) 366-0325 |
| 2. | Katherine Dees | 14805 U.S. Hwy 82
Maplesville, AL 36750
(334) 366-0325 |
| 3. | Shane Archer | 1012 Longfield Drive
Prattville, AL 36067
(334) 365-3662 |

4. Mark Bornberg 2382 County Road 65
Marbury, AL 36051
(334) 358-9510
5. Mark Hanks 136 Patrick St.
Prattville, AL 36067
(334) 358-8359
6. Spencer Louis 5900 Wellbourne Place
Montgomery, AL 36116
(678) 548-7652
7. Chris Weihe 308 Golson Road
Prattville, AL 36067
(334) 365-1756
8. Bill Sievers 5740 Pineleaf
Millbrook, AL 36054
(334) 328-6142
9. John Wingo 1508 Maples Village Court
Pell City, AL 35128
(205) 966-0369
10. Robert Hall Robert Hall & Associates
2866 Y Dauphin Street
Mobile, AL 36606
(251) 471-3267
*(Expert Witness - See Rule 26(a)(2)(B) report filed
previously, along with exhibits and supplements)*
11. Ronnie House HMMA
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000

II. Plaintiff may call the following witnesses:

1. John Applegate HMMA
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000
2. Drake Barefoot 101 Lee Road 855

- Phoenix City, AL 36870
(334) 298-9178
3. Sgt. Franklin Barnes Detachment 1, 1165th Military Police
Alabama Army National Guard
95 Airport Drive
Brewton, AL 36426
(251) 867-5473
4. Jim Brookshire HMMA
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000
5. Captain Christopher Butler Alabama Army National Guard
508 Highway 82 Bypass West
Prattville, AL 36067-2851
(334) 365-9096
6. Rob Clevenger HMMA
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000
7. Lt. Colonel Todd Harrison 766 Burr Oak Drive
Greenwood, IN 46143
(317) 883-0645
8. Kevin Hughes HMMA
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000
9. Barry Jackson HMMA
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000
10. John Gerard Kalson HMMA
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000

11. Sgt. James Martin
Alabama Army National Guard
550 Fairwood Blvd.
Fairhope, AL 36532
(251) 928-9333
12. John McClenney
HMMA
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000
13. Kisha Morris
Kia Motors Corporation
West Point, GA
14. Gwang Mun
HMMA
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000
15. Richard Neal, Esq.
HMMA (General Counsel)
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000
16. Mickey Ralph Phillips
HMMA
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000
17. Greg Prater
18. Sgt. FC Wendell Richburg
1165th MP
550 Fairview Boulevard
Fairhope, AL 36532
(251) 928-9333
19. Chris Smith, Esq.
HMMA (In-House Counsel)
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000
20. Wendy Warner
HMMA
700 Hyundai Boulevard

Montgomery, AL 36105
(334) 387-8000

21. William Ware

HMMA
700 Hyundai Boulevard
Montgomery, AL 36105
(334) 387-8000

Dated this the 5th day of March, 2008.

s/ Jeffrey R. Sport

Jeffrey R. Sport (SPORJ5390)
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OF COUNSEL

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P.O. Box 832
Mobile, AL 36601
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(251) 434-0047 Fax
Email: dam@krmlaw.us

CERTIFICATE OF SERVICE

I do hereby certify that I have served on this 5th day of March, 2008, the foregoing pleading on all counsel of record by depositing a copy of same in the United States Mail with postage prepaid to:

J. Trent Scofield, Esq.
Timothy A. Palmer, Esq.
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
One Federal Place, Ste. 1000
1819 Fifth Avenue North
Birmingham, AL 35203

Matthew Kinard Johnson, Esq.
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
PO Box 2757
Greenville, SC 29602

s/ Jeffrey R. Sport _____
COUNSEL